



June 14, 2018

Marlene H. Dortch  
Secretary Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: MB Docket No. 17-289

Dear Ms. Dortch:

I am writing in support of the Commission's proposal to adopt an incubator program to promote small business ownership and diversity in broadcasting. From my own experience and my interaction with other smaller operators and prospective owners, the program will help aspiring owners achieve their goals and bring fresh perspectives to the airwaves.

WDKN is the only radio station licensed to the city of Dickson, Tennessee, where my family and I reside. During the heart of the recession in 2009, the station went off the air. My wife (a Dickson native) and I founded R & F Communications, Inc. (R & F) to purchase the station. To finance the acquisition, we initially approached a large national bank where we maintained our own savings accounts, hoping to secure a Small Business Administration (SBA)-backed loan. But the station had been operating at a financial loss for more than ten years, and considering the station's financial challenges, the bank declined. We had success with a local bank in Dickson, but without any SBA backing—we had to use our home as collateral for the loan. This helped with the purchase price, but working capital came out of our own pockets. If we had not had long successful careers and significant equity in our home by the time of our purchase, owning and operating WDKN would not have been possible.

When we decided to purchase WDKN, we saw an opportunity to create closer ties between the station and the community. Before we became the licensee, the station was airing a combination of syndicated talk and classic country. But the audience for these formats was waning, and there was a much bigger appetite in Dickson for Top 40 country music and local content. One of the first things we did to reach out to untapped audiences in our community was to engage with its youngest members. We began inviting elementary and middle school classes, girl scouts and boy scouts into the station for tours, events and on-air opportunities. Our programming also began to respond to the hunger for local content. We cover local news, traffic politics and high-school activities. In addition to high school sports, we started coverage of non-sports activities at the local high school, so the activities of the drama, chess and other clubs are also highlighted in our reporting. As the first African-American owners of WDKN, we have embraced the diversity of our community, and hired personnel from a variety of backgrounds. If you haven't been to a station where an African-American DJ who moved to Tennessee from the Virgin Islands spins hot country, you can find it here.



Our efforts to more closely and creatively engage with the local community translated into bigger audiences and better advertising sales. The station is no longer at risk of going silent, and while there have been challenging times, we are not operating at a loss.

With the success we have had, R&F is definitely considering expansion. However, we are concerned about whether we can secure a loan that will be adequate to cover both the purchase price of a desirable station and the working capital needed to operate the station. While we were able to finance our first station with a loan and personal savings, buying a station in a larger market will be more expensive, and even our strong track record may not be enough to secure the funds for our next purchase and our initial operating expenses. We are in the process now of searching for the right target station and financing for the deal. There can sometimes be a "chicken and egg" problem in searching for the right deal: You may not be able to secure financing until you have data on a potential station to buy, but you also may not be taken seriously as a potential purchaser unless you have the financing. An incubator program could help newer, smaller broadcast owners address these financing challenges and enter the marketplace or expand a small group.

I appreciate the FCC's consideration of my views as you work to develop an incubator program. Please feel free to contact me with any questions.

Sincerely,

Kenneth W. Forte  
President/Co-Owner  
R & F Communications, Inc.